

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	13 CR 685
v.)	Magistrate Judge Mary M. Rowland
)	
DIKE AJIRI,)	
Defendant.)	

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the petitioner, DIKE AJIRI, by and through his attorney, DARRYL A. GOLDBERG, and respectfully requests this Court modify the conditions of his pretrial release to include permission to travel within the continental United States with prior notice to the United States Pretrial Services Office, and in support of his motion states as follows:

1. On August 28, 2013, the Honorable Court entered an order setting the conditions of Mr. Ajiri's release on bond, which included, amongst other conditions, a condition limiting his travel to the Northern District of Illinois. (Docket Entry No. 17)
2. Mr. Ajiri respectfully requests that his conditions of release be modified to permit travel within the continental United States with prior notice to the United States Pretrial Services Office, for in sundry reasons, primarily involving medical, employment, and family matters.
3. On November 27, 2013, Counsel for Ajiri spoke with United States Pretrial Services Officer Claudia Rios who advised that her office does not object to modify Mr. Ajiri's pretrial release to include travel within the continental United States. She also noted that Mr. Ajiri was been compliant with all conditions of pretrial release to date.
4. Moreover, Counsel for Ajiri also spoke with AUSA Stephen Lee who advised that he has

no objection to Mr. Ajiri's request.

WHEREFORE, based upon the foregoing, Mr. Ajiri respectfully requests that this Honorable Court modify the conditions of his pretrial release and allow him permission to travel within the continental United States with prior notice to the United States Pretrial Services office.

Respectfully submitted,

s/ Darryl A. Goldberg
Attorney for Dike Ajiri

Darryl A. Goldberg
LAW OFFICES OF DARRYL A. GOLDBERG
111 West Washington Street, Suite 1025
Chicago, Illinois 60602
(773) 793-3196

CERTIFICATE OF SERVICE

I, Darryl A. Goldberg, an attorney, certify that in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the foregoing document was served on November 27, 2013, pursuant to the District Court's system as to ECF filers.

s/ Darryl A. Goldberg
Darryl A. Goldberg